

Revised Document Log for EPA-R6-2018-008581 Modified Final Confidentiality Determination								
No.	Bates no.	Title	Pages	Status	FOIA Exemption(s) 5 U.S.C. § 552	Comments	Substantiation claim	Exhibit
1	00001-00025	Cover, Table of contents, Background Summary, Areas of Noncompliance	25	release in full	none	Info is available in required facility permits, and Formosa website gives much of this history, plant expansion, production capacity percentage, investment cost and number of employees.	Sole CBI claim is "background" paragraph on page 6.	CWA
2	00026-00049	CWA NPDES cover, Table of contents, Summaries etc.	24	changed from RIF to release with redaction	(b)(4)	Redacted portion of pages 29-31. EPA is aware of public contract but not certains details concerning tank contents. Redacted tank sizes due to Argus.	CBI claim on portion of pages 29-39, 42-43, and 45.	CWA
3	00131-00149	CWA Appendix C NEIC Inspection Photographs (two originals were missed)	21	changed from RIF to release with redaction	(b)(4)	Sampling locations required public for compliance evidence. Redacted photos 8, 14, 31, and 38.	CBI claim on photos 1-21, 31-35, and 38-39.	CWA
4	00150-00152	CWA Appendix D Wastewater Treatment figures (process flow diagrams dated 1998)	3	release in full	none	Public info in required facility permit.	CBI claim on pages 151-152.	CWA

5	00155-00161	CWA Appendix F Storm Water Outfall Photographs	8	changed from RIF to release with redaction	(b)(4)	Sampling locations required public for compliance evidence. Redacted portion of photo 6 only.	CBI claim on all photos.	CWA
6	00162-00252	CWA Appendix G Discharge Monitoring Reports and Associated Cover Letters [2001- 2003]	91	release in full	none	DMR reports are public by statute.	CBI claim on portion of pages 163, 167, 172, 174, 180, 188, 211, 218, 231, 234, 237, 243, 245, and 251.	CWA
7	00265-00297	Spill notification (CERCLA § 103) and Emergency Planning and Community Right-to Know-Act (EPCRA §§ 304, 311, 312 and 313) Cover, Table of contents, Background Summary, Areas of Noncompliance	33	release in full	none	Formosa substantiation only listed Bates No. 267 for employee names.	Sole CBI claim is employee names on page 267.	CERCLA_EPCRA
8	00299-00338	CERCLA_EPCRA Appendix A Formosa Spill/Release Reporting Procedure 05- Notification to Agencies issue date Apr 1 2002	40	changed from RIF to release with redaction	(b)(4)	Facility SOP. Not required to be public.	CBI claim on pages 300-338	CERCLA_EPCRA

9	00339-00344	CERCLA_EPCRA Appendix B VCM Emissions modeling discussion	6	changed from RIF to release with redaction	(b)(4)	Redacted bracketed unit dimensions info. Duplicate of 00658 & 00659, emissions modelling.	CBI claim on portion of pages 340 and 341.	CERCLA_EPCRA
10	00345-00357	CERCLA_EPCRA Appendix C TRI Report background calculations 2002	13	release in full	none	Duplicate info as 663-674. Required public reporting, TRI emissions information. No calculations, misleading title. Can find on EPA website.	CBI claim on pages 346-357.	CERCLA_EPCRA
11	00358-00421	CERCLA_EPCRA Appendix D Submitted CERCLA Reports for Vinyl Chloride	64	changed from RIF to release with redaction	(b) (4)	Redacted pages with forms, CBI claim only on forms. Redacted pages 362, 391, 396, 399, 406, 411, 416, and 421. Other info is public on state website.	CBI claim of pages 362, 391, 396, 399, 406, 411, 416, and 421.	CERCLA_EPCRA
12	00422-00423	CERCLA_EPCRA Appendix E Formosa Maintenance contractor paint/solvent background calculations summary sheet	2	changed from RIF to release with redaction	(b)(4)	Supplier information claimed by Formosa, not required public.	CBI claim on page 422.	CERCLA_EPCRA

13	00431-00461	Process Description/Waste Generation - Introduction, unit operation descriptions	31	additional redaction	(b)(4)	Not public, not required to be public. Formosa asserted detailed process descriptions in their RCRA Key for CBI. Only pages 431-432 releasable.	CBI claim on pages 433-461.	RCRA
14	00462-00479	Resource conservation and recovery act-Hazardous waste management Cover, Table of contents, Background Summary, Areas of Noncompliance	18	additional redaction	(b)(4)	This Media Report contains public information found on Formosa website and in required waste permits. Redactions done per Formosa CBI Table for specific Bates numbers for claims of "description of distillation bottoms change and equipment {464}; Table 1 contains process byproduct information, description of bottoms usage {466-467}; names of business associates, byproduct and product descriptions {468-469}.	CBI claim on portion of pages 464-472, 474, and 476.	RCRA

15	00481-00515	RCRA Appendix A Photographs	35	changed from RIF to release with redaction	(b)(4)	Waste sampling and location information required to be public. Redacted photos 2-8, 10-11, 19-21, 25-27, 29-36, and 46-47.	CBI claim on photos 2-13, 19-21, 25-41, and 45-68.	RCRA
16	00516-00527	RCRA Appendix B Letters regarding distillation bottom regulatory status	12	release in full	none	These 12 pages consist of 5 letters already considered public records; some may be on State websites.	CBI claim on pages 517-527.	RCRA
17	00528-00530	RCRA Appendix C TNRCC Bio-sludge delisting letter Apr 5 1996	3	release in full	none	State letter is a public document. Formosa only asserted employee names as CBI.	CBI claim on portion of pages 529-530.	RCRA
18	00531-00534	RCRA Appendix D Scrap PVC Reports for 2001, 2002, and 2003 Contains Confidential Business Information	4	additional redaction	(b)(4)	Not public, not required to be public.	CBI claim on pages 532-534.	RCRA
19	00574-00577	RCRA Appendix F April 2004 Stripper Effluent Data	4	release in full	none	Public. Formosa only claimed employee names, not the data. Data is used to show compliance with water treatment requirements.	CBI claim on portion of pages 575-577.	RCRA

20	00600-00601	RCRA Appendix H Formosa distillation bottoms PCB analytical data	2	release in full	none	Formosa only claimed employee name as CBI.	CBI claim on portion of page 601.	RCRA
21	00604-00656	CAA Cover, Table of contents, Background Summary, Areas of Noncompliance	53	changed from RIF to release with redaction	(b)(4)	Redacted info on pages 615, 626-627, 632-633, 640-647, 651, and 655 -- contractor and software company, tank and column names, flow rate. All other content is public because it is monitoring evidence.	CBI claim on portion of pages 607, 615, 619-622, 626-627, 632-633, 640-642, 645-647, 651, and 654-655.	CAA
22	00658-00662	CAA Appendix A VCM Emissions Modeling Discussion "VCMAmbientData Writeup.pdf"	5	changed from RIF to release with redaction	(b)(4)	Redaction on pages 658 and 659 of unit dimensions info. Other info is emissions modelling.	CBI claim on portion of pages 658-659.	CAA
23	00663-00674	CAA Appendix B TRI Report Background Calculations "VCM- PVC-TRI Emissions Bkgd Calcs.pdf"	12	release in full	none	Public. Duplicate of 345-357.	CBI claim on all pages.	CAA
24	00675-00737	CAA Appendix C Submitted CERCLA Reports for Vinyl Chloride "2003Feb- NovVCMReleaseRep orts.pdf"	63	changed from RIF to release with redaction	(b)(4)	Release reports are already in public domain via TCEQ. Redact 8 forms pages per Formosa claim on key.	CBI claim on portion of pages 678, 707, 712, 715, 722, 727, 732, and 737.	CAA

25	00746-00757	CAA Appendix F VCM Leak Detection and Elimination Program Description "VCMAmbientProgr am.pdf"	12	release in full	none	Already public via TCEQ; Required for Subpart F NESHAP and Special Condition No. 16 of Air permit 7699. Formosa response only claims employee names and contact info.	CBI claim on portion of pages 747 and 757.	CAA
26	00758-00763	CAA Appendix G Ambient Monitoring system Operation Procedure "VCMAmbientProce dure.pdf"	6	changed from RIF to release with redaction	(b)(4)	Formosa claim of Internal records/procedure on key. Not required to be public. All pages redacted.	CBI claim on all pages.	CAA
27	00768-00772	CAA Appendix J Frequency of Causes of Excess Emissions by Cause Type	5	release in full	none	All information in the public domain. This information was synthsize from reports submitted by the facility to EPA or TCEQ.	CBI claim on all pages.	CAA
28	00792-00855	CAA Appendix P HON Subpart H Semiannual Reports	64	release in full	none	Required emission reports required by statute. Employee	CBI claim on portion of several pages for employee names	CAA
29	00868-00934	CAA Appendix S Annual TAB Submittals	66	release in full	none	Required emission reports required by statute. Employee	CBI claim on portion of several pages for employee names	CAA
30	00935-01026	CAA Appendix T Portions of Benzene Waste Operations NESHAP Compliance Procedure 165	92	changed from RIF to release with redaction	(b)(4)	Not public, not required to be public. Formosa claim on SOP.	CBI claim on pages 936-1026.	CAA
31	01027-01028	CAA Appendix U Spent Caustic Block	2	changed from RIF to release with	(b)(4)	Formosa claim of CBI on production	CBI claim on page 1028.	CAA

32	01029-01031	CAA Appendix V Formosa Flow Rate	3	changed from RIF to release with	(b)(4)	Formosa claim of CBI on production	CBI claim on pages 1030-1031.	CAA
33	01054-01069	CAA Appendix X Olefins II Benzene Waste Inspection Logs	16	changed from RIF to release with redaction	(b)(4)	Benzene waste effluent data. Work logs and data required to show compliance with NESHAP Subpart FF. This is not the actual procedure. Redactions of portion of pages 1056-1057, 1060- 1061, and 1068.	CBI claim on pages 1055-1061.	CAA
34	01072-01133	CAA Appendix Z Photographs	62	changed from RIF to release with redaction	(b)(4)	Sampling locations required public for compliance	CBI claim on several photos.	CAA
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